

ORIGINAL

BELLSOUTH

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Kathleen B. Levitz
Vice President-Federal Regulatory

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EX PARTE OR LATE FILED

January 12, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
JAN 12 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copy of Version 2.1 of the BellSouth-Georgia OSS Flow-Through Evaluation Plan filed by KPMG with the Georgia Public Service Commission on January 7, 2000.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the record in each of those proceedings.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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January 12, 2000

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WRITTEN EX PARTE

Ms. Claudia Fox
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Federal Communications Commission
The Portals
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Washington, D.C. 20554

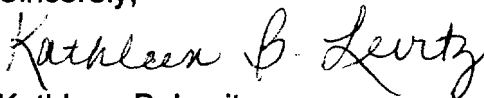
Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached is a copy of Version 2.1 of the BellSouth-Georgia OSS Flow-Through Evaluation Plan. This update, filed by KPMG with the Georgia Public Service Commission on January 7, 2000, should replace Version 2.0 of the OSS Flow-Through Evaluation Plan, which appears behind the last tab in the BellSouth-Georgia OSS Evaluation Master Test Plan Version 4.0. Version 4.0 of the Master Test Plan was filed with the Georgia Commission on December 16, 1999. I am sending this filing to you in response to the request that BellSouth share with you any status reports prepared by KPMG as part of the third party testing program currently underway in Georgia. If you have any questions after reviewing the revision, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in those dockets.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Agee
Jake Jennings



303 Peachtree Street, N.E.
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Telephone 404 222 3000
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January 7, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW
Atlanta, GA 30334

RECEIVED

JAN 07 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

Dear Ms. O'Leary:

Re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U.

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of the BellSouth - Georgia OSS Flow-Through Evaluation Version 2.1. This document is an update to version 2.0.

The updated document contains material that is designed to provide the Commission and other interested parties with additional detail about various aspects of the evaluation.

The updated document does not constitute a change in direction with respect to the testing, nor is it in conflict with the Commission's July 2, 1999 order approving BellSouth's Third Party Testing Plan.

Please file the document and return one (1) file-stamped copy of the document to us in the enclosed envelope.

Thank you for your assistance in this matter.

Very truly yours,

KPMG LLP


David Frey
Manager

Enclosures



KPMG LLP, KPMG LLP, and KPMG LLP are member firms of the KPMG network, a global organization of member firms of KPMG Network, a Swiss entity.

Flow-Through Evaluation

Version 2.1

January 3, 2000

Flow-Through Evaluation

A. Overview

A key element in the ability of a Competitive Local Exchange Carrier (CLEC) to compete in the local telecommunications market is the ability of the CLEC's order to "flow through" the incumbent carrier's Operations Support Systems (OSS). Flow-through is defined as electronic transmission through a gateway and acceptance into the incumbent's (in this case BellSouth's) back-office ordering systems without manual intervention by a customer service representative at the incumbent carrier (in BellSouth's case, by the Local Carrier Service Center (LCSC)).

The purpose of the flow-through evaluation described here is twofold: to review the accuracy of the BellSouth Percent Flow-Through Service Request Service Quality Measurement (SQM)¹ (the "Flow-Through Percent") as reported by BellSouth for the months of July, August, and September 1999 as called for in the Georgia Order², and to review the accuracy of the data that are used to calculate that SQM using the results of the transaction test.

B. Scope

The scope of the procedures is defined below in Section D "Procedures to be Performed."

C. Description of BellSouth's Flow-Through Percent Calculation

The Flow-Through Percent is published by BellSouth on a monthly basis to allow participants an opportunity to evaluate BellSouth and CLEC flow-through ratios. The Flow-Through Percent is calculated based on a compilation of data retrieved from a database (data warehouse) which measures the percentage of LSRs submitted electronically that pass through BellSouth's ordering OSS without manual intervention.

The database is compiled from data extracted from the Service Order Control System (SOCS) and other systems. The extracted data is used to calculate the percentage of flow-through LSRs including every mechanized service request submitted to the gateway systems (EDI, LENS and TAG) that are LESOG eligible. BellSouth *excludes* certain mechanized orders from the Flow-Through Percent including: 1) all orders which require manual handling by the BellSouth LCSC (such as complex services including ISDN, hunting, PBX trunks, Synchronet®, and services with special pricing) and 2) service requests containing CLEC errors. The final number of service requests that flow through to SOCS is the numerator in the calculation of the aggregate percentage of service

¹ As defined in Appendix D-2 to the "BellSouth - Georgia OSS Evaluation Master Test Plan" version 3.0, Dated October 15, 1999.

² Order on Petition for Third Party Testing, Dated May 20, 1999, p. 3 - 4

requests that successfully flow-through the ordering OSS, and the total number of service requests that were truly LESOG eligible (as defined by BellSouth and discussed in detail below in the section entitled "Flow-Through Percent Calculation") is the denominator.

BellSouth Order Flow-Through Process

The following represents the CLEC ordering process flow which outlines LSR transmission by the CLEC to SOCS and the order flow-through process through BellSouth's OSS.

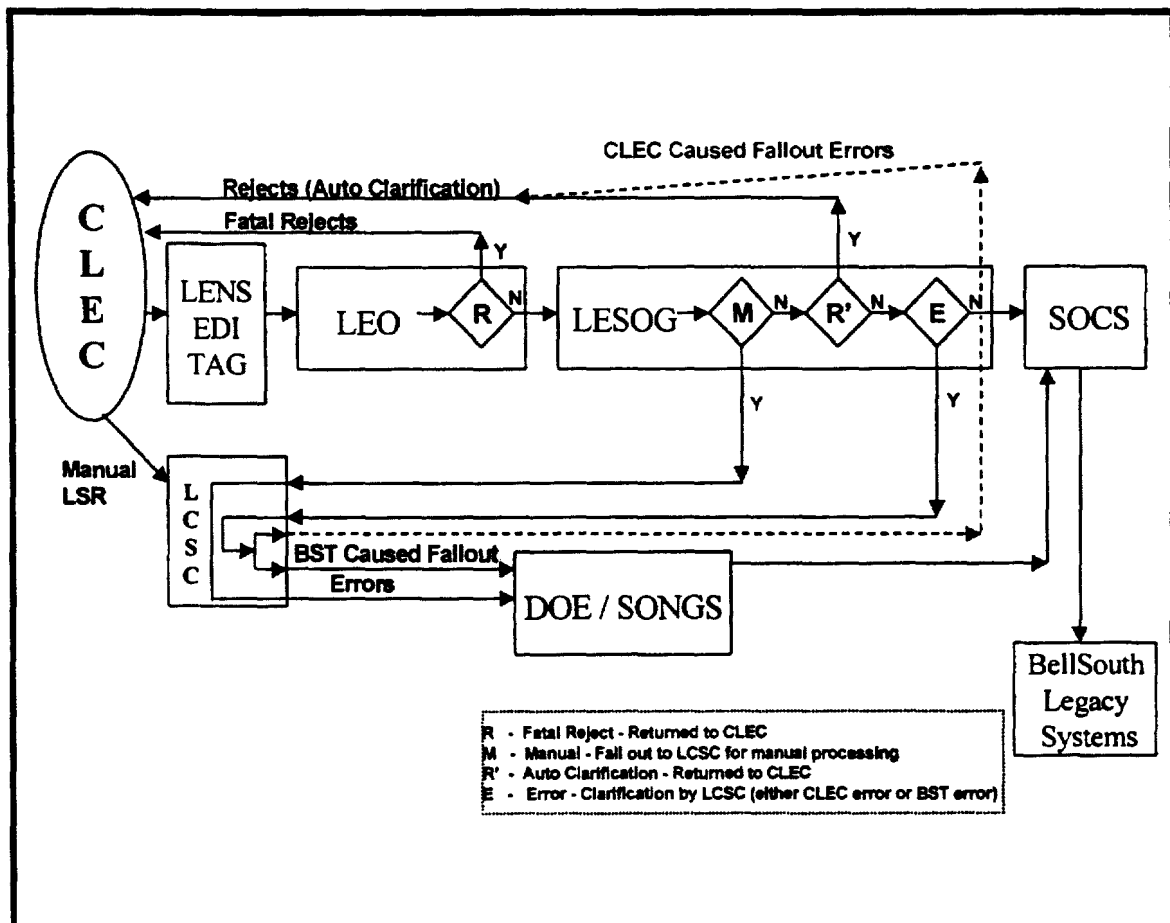


Figure 1 – Order Flow-Through Process

Flow-Through Percent Calculation

The flow-through percentage is calculated as follows:

Note: The calculation as well as the definitions described below were obtained from Appendix D-2 to the "BellSouth – Georgia OSS Evaluation Master Test Plan" version 3.0.

Flow-Through % = Issued Service Orders (LESOG Flow-Through)
Valid Service Requests

Where:

Issued Service orders = The total number of service requests that flow through to BellSouth's back-office systems (SOCS).

And valid service-requests = Total mechanized LSRs (including resubmissions)
LESS: fatal rejects, manual fallout, auto clarification, and CLEC caused fallout.

And where:

Fatal rejects = Errors that prevent an LSR, submitted by the CLEC, from being processed further than LEO. These types of errors will be detected by LEO which performs edit checks to ensure that the data received is formatted correctly and complete.

Manual fallout = Certain orders which are sent to BellSouth via an electronic interface are designed to fall out of the mechanized order process due to their complexity. These order types include ISDN, hunting, PBX trunks, Synchronet, etc..

Auto clarification = Errors that occur due to invalid data within the LSR. These types of errors will be detected by LESOG which performs data validity checks to ensure that the data within the LSR is correct and valid.

CLEC caused fallout = Errors which require manual review by the LCSC and are determined by the LCSC to have been caused by the CLEC. If an error is determined to be caused by a CLEC, the LSR will be sent back to the CLEC for clarification.

D. Procedures to be Performed

The objectives of the test will be met through a combination of transactional and operational procedures described as follows:

Transactional: The first dimension of the test is transactional and will consist of generating, submitting and logging test orders. Testing will be accomplished through the test tools employed in the Third Party OSS Test required by the Georgia Public Service Commission³ and set out in the corresponding Master Test Plan.⁴ These test tools are designed to test all aspects of interfacing with BellSouth's OSS.

Operational: The second dimension of the test is operational and will be a multi-dimensional test method focused on the form, structure, and content of the test target. This test will address the organizational and process aspects of flow-through reporting. The operational dimension of the test also specifically includes the calculation of the Flow-Through Measurement and the technology supporting it.

The accuracy of BellSouth's performance measurement system will be assessed by comparing the transaction data to BellSouth raw data and replicating the SQM values for each of the three months. Replication entails using BellSouth data to calculate SQM values using independent calculations and verifying whether those values differ from the values reported by BellSouth.

CLEC personnel will be interviewed to gain an understanding of their experience with BellSouth's flow through reporting. Participants will be asked to provide documentation of attempts to reconcile their actual flow through with that reported by BellSouth and any issues observed.

³ Order on Petition for Third Party Testing, Dated May 20, 1999, p.3

⁴ Georgia OSS Evaluation Master Test Plan, version 3.0, Dated October 15, 1999, Section III-5

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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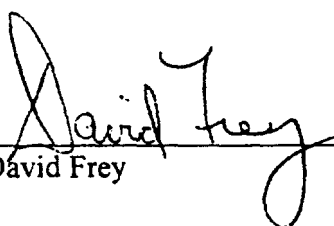
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— This 7th day of January 2000.


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